

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

*David E. Patton
Executive Director
and Attorney-in-Chief*

*Southern District of New York
Jennifer L. Brown
Attorney-in-Charge*

January 26, 2023

VIA ECF

The Honorable Laura T. Swain
United States Chief District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

**Re: United States v. Jonathan Acosta
22 Cr 628 (LTS)**

Dear Chief Judge Swain,

I write to request the Court temporarily modify Mr. Acosta's bail conditions to allow him to travel to Reading, Pennsylvania on a day agreed upon between Mr. Acosta and Pretrial Services after February 3, 2023. Mr. Acosta will be visiting his sister and newborn niece. He will travel with his mother and girlfriend and return the next day. Because Mr. Acosta is on home detention, Pretrial opposes this modification as a matter of policy. However, his officer notes that Mr. Acosta has been in full compliance with his conditions of release, and he will provide his officer with the address and agreed-upon time frame should the Court grant the application. The Government defers to Pretrial. Thank you for the Court's consideration of this request.

The forgoing modification request is granted. Mr. Acosta shall provide Pretrial Services with all relevant information regarding his visit in advance (including the address, time frame, and his plans for transportation). DE 31 is resolved. SO ORDERED.

1/26/2023

/s/ Laura Taylor Swain, Chief USDJ

CC: AUSA Sarah Kushner, Jr., Esq.

Respectfully Submitted,

/s/ 

Ian H. Marcus Amelkin
Federal Defenders of New York, Inc.
(212) 417-8733
ian_marcus_amelkin@fd.org